

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN**

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CHAD PELISHEK,

Plaintiff,

v.

Case No. 2:23-cv-1048-WED

CITY OF SHEBOYGAN, et. al.,

Defendants.

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**JOINT RULE 7(h) EXPEDITED NON-DISPOSITIVE MOTION TO EXTEND  
DEADLINES TO FILE RESPONSES AND REPLY BRIEFS TO PARTIES'  
SUMMARY JUDGMENT MOTIONS**

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The Parties, by and through their undersigned counsel, respectfully request a short extension of the deadlines to file their respective summary judgment Reply Briefs from May 2, 2025 to May 7, 2025 in light of recent developments. In support of this Joint Motion, the Parties state as follows:

1. On April 23, 2025, the Court reset deadlines for Summary Judgment Reply Briefs to May 2, 2025. (ECF No. 159.)
2. On April 29, 2025, counsel for Plaintiff conferred with Defendants' counsel regarding Defendants' request for additional pages for their Summary Judgment Reply Brief and Plaintiff's discovery of clerical and case cite errors in Plaintiff's summary judgment related briefs. On April 30, Plaintiff subsequently filed Notices of Errata for ECF 125 & 143 and the corrected Briefs. (ECF Nos. 160 - 163.)
3. Pursuant to the Parties' through counsel conferencing, Defendants will not file an objection to the Notices of Errata. The Parties, however, agree that additional time for Reply Brief

submissions is in order and have agreed to jointly request a three-business day extension (to May 7, 2025) for filing of Summary Judgment Reply Briefs. This will, for instance, allow for review, analysis and adjustments, if any, to the Parties' respective Reply Briefs in connection with any matter adjusted or corrected, while ensuring that the Parties are also able to attend to preexisting responsibilities in other matters.

4. Additionally, counsel for Plaintiff had unexpected issues arise in the past week in unrelated matters that needed to be immediately addressed and request a short extension to their Reply in Support Brief for Plaintiff.

5. The Parties thus respectfully request the Court find good cause to grant this joint request for a short enlargement of the deadline for Summary Judgment Reply Briefing (including any supporting material) to May 7, 2026.

Dated: May 1, 2025

Respectfully Submitted,

**For Plaintiff:**

/s/ Jennifer DeMaster

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